

The Boeing Company
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9L-22-N410-BA-085

BY EMAIL AND HAND DELIVERY

Edward Kowalski
Environmental Protection Agency – Region 10
Office of Compliance and Enforcement
1200 6th Ave., Suite 900, MC OCE-164
Seattle, WA 98101

Subject: Plant 2 – OA-11 Interim Measure
40 CFR 761.61(c) Risk-Based Disposal Approval Application and
Interim Measure Work Plan Submittal
Boeing Plant 2, WAD 00925 6819
RCRA Docket #1092-01-22-3008(h)

Dear Mr. Kowalski:

Boeing is requesting a Toxic Substances Control Act (TSCA) Risk-Based Disposal Approval (RBDA) to establish a disposal pathway for soil and inactive stormwater infrastructure (vaults and pipes) contaminated with polychlorinated biphenyls (PCBs). The majority of soil is expected to contain PCB concentrations less than 50 parts per million (ppm); however, there are localized areas of soil that contain PCBs at concentrations greater than 50 ppm. For context, the proposed excavation is approximately 700 cubic yards (cy) with approximately 50 cy of soil with PCB concentrations greater than 50 ppm (Subtitle C disposal) and approximately 650 cy of soils with PCB concentrations less than 50 ppm (Subtitle D solid waste disposal). The maximum depth of the proposed excavation is 15 feet below ground surface.

The work is being managed as part of the Uplands Corrective Measure at Boeing Plant 2 pursuant to the Administrative Order on Consent (Order; Resource Conservation and Recovery Act [RCRA] Docket No. 1092-01-22-3008(h)) issued to Boeing in 1994 by the U.S. Environmental Protection Agency (USEPA) under authority of RCRA Section 3008(h), as amended (42 USC 6928(h)).

The RCRA program has determined that the corrective measure for OA-11 should be performed in 2016 as an interim measure to accelerate its schedule and is requesting that this project be performed jointly with the TSCA program under the RBDA authority. The Interim Measure Work Plan for OA-11 is being submitted to the TSCA program as the application for the RBDA; it provides sufficient details regarding PCB distribution, proposed excavation limits, material handling requirements, and confirmation sample documentation and sample collection.

I hereby certify that 40 CFR 761.61(a)(3)(B) required documentation is on site and available for EPA inspection at Boeing Plant 2, 7755 E Marginal Way S., Seattle, Washington 98108. If you have any questions or require additional information please do not hesitate to contact me at the number below or Will Ernst at (206) 662-1752



Sincerely,

Brian D. Anderson

Brian Anderson
Plant 2 Project Coordinator
Environmental Remediation
M/C 1W-12; 425-373-8825; brian.d.anderson2@boeing.com
Enclosure

cc: Dave Bartus, EPA Region 10 – TSCA
Melissa Blankenship, EPA Region 10 – RCRA

